

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

E.J. BROOKS COMPANY d/b/a
TYDENBROOKS,

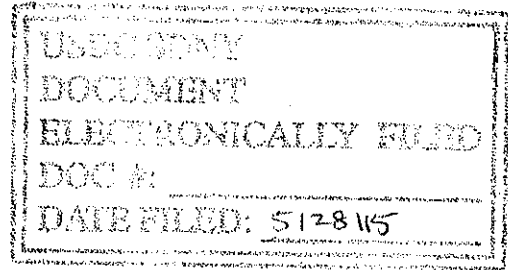
Plaintiff,

- against -

CAMBRIDGE SECURITY SEALS, *et al.*,

Defendants.

Case No. 12 Civ. 2937 (LAP)



JURY VERDICT FORM

Instructions: Please read and answer the questions below, beginning with Question No. 1. The jurors must unanimously agree on the answer for each of the following questions. Please place an "X" next to the jurors' unanimous answer for each question. After you have answered each question, follow the instructions that correspond to your answer. The instructions will either direct you to answer another question or direct you to stop and proceed to the signature page at the end of the document.

- 1. Do you find that Plaintiff has proven by a preponderance of the evidence that it possessed a trade secret, identifiable with reasonable particularity, which was unlawfully misappropriated by the Defendant(s)?**

Cambridge Security Seals ("CSS"): Yes X No _____

Brian Lyle: Yes _____ No X

Gurmeet Singh Grover ("Grover Singh"): Yes X No _____

Michael Gizzarelli: Yes X No _____

If you answered "No" as to all of the Defendants, please proceed to Question No. 4.

If you answered "Yes" as to any of the Defendants please proceed to the next question.

- 2. If you answered "yes" to Question No. 1 as to any Defendant, do you also find that Plaintiff has proven by a preponderance of the evidence that any of the Defendants conspired to misappropriate Plaintiff's trade secret?**

Cambridge Security Seals ("CSS"): Yes _____ No X

Brian Lyle: Yes _____ No X

Gurmeet Singh Grover ("Grover Singh"): Yes _____ No X

Michael Gizzarelli: Yes _____ No X

If you answered "No" as to all of the Defendants, please proceed to Question No. 4.

If you answered "Yes" as to any of the Defendants, please proceed to the next question.

3. For any Defendant for whom you answered either Question No. 1 or No. 2 as "yes," what is the dollar amount of the compensatory damages, if any, Plaintiff is entitled to receive from the Defendant(s) for the misappropriation of trade secret?

Cambridge Security Seals ("CSS"): \$ 1.3 Million

Brian Lyle: \$ -

Gurmeet Singh Grover ("Grover Singh"): \$ 2,000

Michael Gizzarelli: \$ 2,000

Please proceed to the next question.

4. Do you find by a preponderance of the evidence that the Defendant(s) engaged in unfair competition with Plaintiff?

Cambridge Security Seals ("CSS"): Yes X No

Brian Lyle: Yes X No

Gurmeet Singh Grover ("Grover Singh"): Yes X No

Michael Gizzarelli: Yes X No

If you answered "No" as to all of the Defendants, please proceed to Question No. 6.

If you answered "Yes" as to any of the Defendants, please proceed to the next question.

5. For any Defendant for whom you answered Question No. 4 as "yes," what is the dollar amount of the compensatory damages, if any, Plaintiff is entitled to receive from the Defendant(s) for competing unfairly, that is not duplicative of any other damages you may have already awarded?

Cambridge Security Seals ("CSS"): \$ 1.3 Million

Brian Lyle: \$ 2,000

Gurmeet Singh Grover ("Grover Singh"): \$ 2,000

Michael Gizzarelli: \$ 2,000

Please proceed to the next question.

6. Do you find by a preponderance of the evidence that the Defendant(s) was/were unjustly enriched, that is, that the Defendant(s) received a benefit at the Plaintiff's expense that, in equity and good conscience, the Defendant(s) should not retain?

Cambridge Security Seals ("CSS"): Yes X No

Brian Lyle: Yes X No

Gurmeet Singh Grover ("Grover Singh"): Yes X No

Michael Gizzarelli: Yes X No

If you answered "No" as to all of the Defendants, please proceed to Question No. 8.

If you answered "Yes" as to any of the Defendants, please proceed to the next question.

7. For any Defendant for whom you answered Question No. 6 as "yes," what is the dollar amount of the compensatory damages, if any, Plaintiff is entitled to receive for the Defendant(s)'s unjust enrichment that is not duplicative of any other damages you may have already awarded?

Cambridge Security Seals ("CSS"): \$ 1.3 Million

Brian Lyle: \$ 2,000

Gurmeet Singh Grover ("Grover Singh"): \$ 2,000

Michael Gizzarelli: \$ 2,000

Please proceed to the next question.

8. If you answered "yes" to Questions No. 1 and/or No. 4, above, finding any one or more of the Defendants liable to Plaintiff for misappropriation of trade secrets and/or unfair competition, do you also find that Plaintiff is entitled to recover punitive damages against any of the Defendant(s)?

Cambridge Security Seals ("CSS"): Yes No X

Brian Lyle: Yes No X

Gurmeet Singh Grover ("Grover Singh"): Yes No X

Michael Gizzarelli: Yes No X

If you answered "Yes" as to any of the Defendants, please proceed to the next question.

9. For any Defendant for whom you answered Question No. 8 as “yes,” what is the dollar amount of the punitive damages Plaintiff is entitled to receive from the Defendant(s)?

Cambridge Security Seals (“CSS”): \$ _____

Brian Lyle: \$ _____

Gurmeet Singh Grover (“Grover Singh”): \$ _____

Michael Gizzarelli: \$ _____

Instructions to the Foreperson: Once you have indicated the jury’s answers to the questions above, please sign and date this page in the spaces provided below. Then inform the Clerk of Court that you have finished deliberating.


FOREPERSON

Dated: 5/4/15, 2015
New York, New York

Ch. 12